

**SUPPLEMENTAL HOLLEMBEAK DECLARATION  
IN SUPPORT OF AMENDED APPLICATION OF SPS I FUNDO DE  
INVESTIMENTO DE AÇÕES – INVESTIMENTO NO EXTERIOR  
FOR DISCOVERY PURSUANT TO 28 U.S.C. § 1782**

**EXHIBIT K**

Beginning of 2017 suspicious activity report submitted by Barclays NY to the United States  
Financial Crimes Enforcement Network

**SAR Number 31000093847394: HAMBLE CORPORATE SERVICES** is identified as a subject of the following SAR, filed by a depository institution, involving suspicious designation of beneficiaries, assignees or joint owners, suspicious use of multiple accounts, and transaction with no apparent economic, business, or lawful purpose. ©

Activity Dates	Subjects	Amount Involved	Filer and Activity Location
September 06, 2011 to April 12, 2016	<b>HAMBLE CORPORATE SERVICES LIMITED</b> Address: Floor 2nd Market Road Wickford, London, United Kingdom Ss12Obb  25 additional subjects	\$633,944,526	Barclays Bank PLC; New York, New York

**THE SAR FILING INSTITUTION PROVIDED THE FOLLOWING INFORMATION:** The New York Branch of Barclays Bank PLC ("Barclays NY"), a United Kingdom ("UK") banking corporation, maintains a United States Dollar ("USD") correspondent account for its affiliate, Barclays Bank Plc, Knightsbridge ("Barclays UK Wealth"). A Barclays UK Wealth account in the name of **Unifleisch Limited**, also known as **Unifleisch SA** and **Unifleisch S/A** ("Unifleisch") was flagged for review as part of Barclays NY's surveillance program.

Barclays NY is filing this Suspicious Activity Report ("SAR") on Unifleisch, its owners, and its counterparties because:

- Unifleisch was not conclusively identified through Internet research;
- Negative information was discovered on a counterparty identified to be one of the primary sources of funds for Unifleisch's account;
- Unifleisch is transacting with unverifiable parties located in high risk jurisdiction known for money laundering, specifically Panama and Switzerland;
- The relationships between these parties was unclear;
- There was no apparent economic, business, or lawful purpose for the transactions; and
- the payment instruction fields of two (2) relatively large USD wire transfers referenced "Loan agreement;"
  - The terms and purposes for any loan agreements related to Unifleisch and its counterparties are unknown; and
  - The source of funds for the wire activity is unknown.

Moreover, these wire transfers appeared to be layered in a circular scheme as to attempt to disguise or hide the true source of funds and /or its origin.

Background of Unifleisch Limited Unifleisch, which is located at an address in London, UK according to wire details, was not conclusively identified through Internet research. According to Barclays UK Wealth, Unifleisch's account was opened on or about June 17, 2007. The customer profile was said to be in line with the Barclays Group Anti-Money Laundering requirements. Unifleisch was also said to act as an agent for the sale of beef/meat products; working on behalf of JBS SA ("JBS"), Lunsville International Incorporated (Inc.) ("Lunsville"), and Valdarco Investment Incorporated (Inc.) ("Valdarco").

In this arrangement, **Unifleisch is said to receive a 3% commission from JBS for sales generated.** Barclays UK Wealth went on to describe the agency structures as involving the following features:

- **Contracts for the purchase of products or services are concluded by either JBS, Lunsville, or Valdarco directly or through Unifleisch on the instruction of the main clients;**
- Contracts for the sale of products or the provision of services are concluded by the main clients directly, but formalized by Unifleisch on the instruction of the main clients;
- Unifleisch is instructed by either JBS, **Lunsville, or Valdarco** for all action required to be taken;
- Unifleisch will issue invoices with its Value Added Tax ("VAT") number;
- Unifleisch will also sign documents and handle funds; and
- Unifleisch cannot deal with UK suppliers/service providers or UK customers.

Further, according to Barclays UK Wealth, payments from Unifleisch to JBS, Lunsville, and Valdarco represent the funds generated/profits of the agent. USD Wire Transaction Search - Unifleisch Limited Due to a high number of wire transfers with counterparties located in high risk jurisdictions for money laundering, a five (5) year USD wire look-back on Unifleisch was conducted, which revealed the following: Unifleisch Limited On or about and between September 6, 2011 and April 12, 2016,

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*Trecho do alerta da FinCen sobre atividades suspeitas da Unifleisch, que depositava dinheiro da JBS para a Lunsville e Valdarco, no Panamá*